

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

JUL 28 2014

IN THE MATTER OF AN APPLICATION)
OF THE UNITED STATES OF AMERICA)
FOR A WARRANT DIRECTING THE)
PROVISION OF ANY SIGNALING)
INFORMATION, INCLUDING CELL SITE)
INFORMATION, PRECISION LOCATION)
INFORMATION, AND FACTORY)
INSTALLED "GPS" INFORMATION,)
ASSIGNED TO THE AT&T BRAND)
CELLULAR TELEPHONE BEARING)
NUMBER (831) 582-7847.)

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO

No. 4:14MJ5162 (NAB)

FILED UNDER SEAL

AFFIDAVIT

Eric Kruger, being duly sworn, deposes and says that he is a Special Agent (SA) with the Drug Enforcement Administration, duly appointed according to law and acting as such.

Upon information and belief, the AT&T brand cellular telephone bearing number **(831) 582-7847** (hereinafter the **subject cellular telephone**) which is being utilized by Thomas Gregory ANDERSON, Jr., is presently being used in connection with the commission of offenses involving ongoing violations of Title 21, United States Code, Sections 846 and 841(a)(1), by Thomas Gregory ANDERSON, Jr., and others known and unknown.

Your affiant further states that there is probable cause to believe that the signaling information, including cell site information, precision location information, and factory installed GPS information will lead to evidence of the aforementioned criminal offenses as well as to the identification of individuals who are engaged in the commission of those criminal offense and related crimes.

The source of your affiant's information and the grounds for his believe are as follows and are based on your affiant's personal knowledge as well as information provided to your affiant by other agents assigned to the investigation:

In approximately March 2012, investigators initiated an investigation targeting Thomas ANDERSON and several additional subjects involved in the transportation and subsequent distribution of multi-hundred pound quantities of marijuana from California to St. Louis, Missouri and Boston, Massachusetts.

In April 2012, investigators interviewed a Confidential Source (hereinafter referred to as CS #1). CS #1 was arrested for transporting marijuana unrelated to this investigation and CS #1 is cooperating to seek judicial leniency. CS #1 was deemed reliable based on information he/she provided which was confirmed through additional confidential. CS #1 stated between approximately May 2010 and July 2011, he/she transported approximately eight to ten shipments of marijuana, totaling approximately six hundred (600) pounds to ANDERSON, Brian LORD, Brian HOUNSOM, David DODGE and additional associates in St. Louis, Missouri. CS #1 stated he/she coordinated with ANDERSON regarding the shipments of marijuana.

On June 28, 2012, U.S. District Judge Henry E. Autrey, Eastern District of Missouri, authorized the initial interception of wire and electronic communications over target telephone number (573) 424-4464, utilized by Brian LORD. On July 31, 2013, U.S. District Judge John A. Ross, authorized the continued interception of wire and electronic communications over the target telephone utilized by LORD. Based on confidential source information and Title III intercepts, investigators learned ANDERSON was LORD's marijuana source of supply. During the investigation, investigators identified ANDERSON moved from St. Louis to the Boston, Massachusetts, area, where he primarily resided.

On September 28, 2012, U.S. District Judge Audrey G. Fleissig, authorized the initial interception of wire and electronic communications over target telephone (314) 960-5433, utilized by Thomas ANDERSON. Based on information from Precision Location Information warrants

for target telephones utilized by ANDERSON and LORD, in conjunction surveillance and telephone toll analysis, investigators suspected Joseph NATALE who resides in Redding, California, was the current marijuana source of supply for ANDERSON. In addition, during the period of interception, investigators identified ANDERSON stored marijuana proceeds at his parent's residence located in St. Louis, Missouri.

On November 13, 2012, U.S. Magistrate Judge Terry I. Adelman, authorized a federal search warrant for ANDERSON's parent's residence located at 4749 East Concord, St. Louis, Missouri and a federal search warrant for ANDERSON's sister, identified as Rachel ANDERSON and Brian HOUNSOM's residence located at 67 Blackthorn Drive, St. Louis, Missouri. During the execution of the search warrant at ANDERSON's parent's residence, ANDERSON was present at the residence and investigators seized approximately \$69,000 and five firearms from the residence.

The execution of the search warrant at Rachel ANDERSON and HOUNSOM's residence resulted in the seizure of an ABF Freight Systems receipt signed by Jaclyn TEBBE. Investigators later confirmed the receipt was the result of TEBBE picking up a shipment of marijuana concealed in a pod style container at the ABF Freight Systems hub in St. Louis, Missouri. Further investigation revealed TEBBE picked up three additional shipments of marijuana for LORD and ANDERSON in the St. Louis, area.

Following the execution of the federal search warrant, investigators obtained information from multiple confidential sources that ANDERSON fled to both Mexico and the city of Dubai in the United Arab Emirates.

On December 14, 2012, investigators interviewed CS #2 in St. Louis, Missouri. CS #2 is characterized as a defendant Confidential Source and CS #2 is cooperating to seek judicial

leniency based on his/her role in the marijuana distribution organization. CS #2 was deemed reliable based on information he/she provided which was confirmed through additional confidential sources. CS #2 identified Joseph NATALE who resides in Redding, California, as ANDERSON's marijuana source of supply. CS #2 stated he/she assisted ANDERSON in coordinating the shipment of approximately four shipments of marijuana, each containing approximately one hundred (100) pounds, via a freight transportation company from Redding, California to St. Louis, Missouri. CS #2 stated he/she previously transported bulk U.S. currency via commercial airlines from St. Louis to California for ANDERSON and on one occasion, CS #2, accompanied by David DODGE, transported \$300,000 via private aircraft from St. Louis to Redding, California, for ANDERSON and NATALE. Following a seizure of U.S. currency in this investigation from CS #2, ANDERSON stopped utilizing CS #2 to assist in the transportation and distribution of the marijuana. Further investigation revealed three additional confidential sources CS #2 assisted ANDERSON with the transportation and distribution of marijuana in St. Louis, Missouri.

In April 2013, investigators identified a Piper PA-31 multi-engine aircraft bearing tail number N27439 registered to Joseph NATALE. SA Moles subsequently placed a "watch" on the aircraft through the Air and Marine Operation Center (AMOC).

On October 26, 2013, personnel from AMOC advised the aircraft bearing tail number N27439 was traveling from Franklin, Pennsylvania to New Bedford, Massachusetts. On October 26, 2013, investigators from the DEA New Bedford Resident Office responded to the New Bedford Regional Airport and located the unoccupied aircraft in front of Colonial Air at New Bedford Regional Airport in New Bedford, Massachusetts.

On November 02, 2013, investigators initiated contact with Travis CHAMP, Michael VALENCIA and Neel HILL as they approached the aircraft. Investigators subsequently seized a suitcase containing \$946,900. Investigators also initiated contact with Bryan BRANDT and Nicholas JOHNSTON in the parking lot at the airport and both BRANDT and JOHNSTON have previously been identified in this investigation.

On November 08, 2013, investigators interviewed a Confidential Source (hereinafter referred to as CS #3). CS #3 is characterized as a defendant confidential source and CS #3 is cooperating with investigators to seek judicial leniency based on his/her role in the marijuana distribution organization. CS #3 was deemed reliable based on information he/she provided which was confirmed through additional confidential sources and surveillance. CS #3 stated he/she was introduced to NATALE through a mutual friend and CS #3 subsequently began to transport marijuana from California to St. Louis, Missouri and Boston, Massachusetts, via private aircraft for NATALE and ANDERSON. CS #3 stated he/she transported at least two shipments of marijuana by renting a single engine aircraft in Livermore, California. CS #3 stated in approximately October or November 2012, NATALE and ANDERSON purchased the aircraft bearing tail number N27439 for intent of transporting marijuana. CS #3 stated he/she subsequently utilized the aircraft to transport marijuana for NATALE and ANDERSON to St. Louis and the Boston, Massachusetts, area.

On March 14, 2014 and June 11, 2014, investigators interviewed a Confidential Source (hereinafter referred to as CS #4). CS #4 is cooperating with investigators to seek judicial leniency based on his/her role in the marijuana distribution organization. CS #4 was deemed reliable based on information he/she provided which was confirmed through additional

confidential sources and documents. CS #4 confirmed the aircraft registered to NATALE was purchase by NATALE and ANDERSON which was utilized to transport marijuana. CS #4 stated ANDERSON also invested marijuana proceeds by renting several parcels of land in the Redding area which were utilized for outdoor marijuana grow operations. CS #4 stated prior to utilizing the aircraft to transport marijuana, he/she assisted in orchestrating the delivery of hundred pound quantities of marijuana from California to St. Louis, Missouri, which was transported by tractor trailers via a freight company. CS #4 stated on one occasion, CS #4 assisted in coordinating the delivery of approximately four hundred (400) pounds of marijuana from California to the Boston, area which was concealed in industrial style water heaters and transported by tractor trailer via a freight company.

On May 02, 2014, CS #2 contacted SA Moles by telephone and advised he/she obtained telephone number (314) 779-8314, utilized by ANDERSON. CS #2 stated ANDERSON arrived in St. Louis around Easter weekend. CS #2 stated ANDERSON has been associating with Nicholas GRASSO and CS #2 obtained the telephone number (314) 779-8314, utilized by ANDERSON from one of GRASSO's associates.

SA Moles obtained telephone toll records for (314) 779-8314 which revealed the number was subscribed to Laura J. ANDERSON, 4749 E. Concord Road, St. Louis, Missouri 63128. SA Moles obtained telephone toll records from April 12, 2014 through May 04, 2014 and from June 08, 2014 through July 07, 2014. Based on the telephone toll analysis (314) 779-8314, your affiant believed the number was in fact utilized by ANDERSON.

As a result of this information, on July 17, 2014, TFO Alex Jenne presented a warrant requesting the provision of any signaling information, including cell site information, precision location information, and factory installed "GPS" information, assigned to the AT&T cellular

telephone bearing number (314) 779-8314, utilized by ANDERSON.

On July 17, 2014, United States Magistrate Judge Shirley P. Mensah, Eastern District of Missouri, authorized the warrant. On July 17, 2014, SA Moles presented the signed warrant to the DEA Technical Support Unit, who faxed the warrant to the AT&T cellular telephone provider.

On July 18, 2014, the DEA Technical Support Unit and investigators learned from AT&T that ANDERSON's account was suspended due to non-payment. As a result of the account status, investigators were unable to obtain GPS information for telephone number (314) 779-8314, utilized by ANDERSON.

On July 23, 2014, SA Eric Kruger obtained telephone toll records on telephones utilized by ANDERSON, Rachel ANDERSON (ANDERSON'S sister), and a telephone subscribed to Laura ANDERSON (ANDERSON'S mother). Each of these telephones have a prior history of being in contact with ANDERSON'S previously identified telephone numbers. A common call analysis of the toll data from these telephone led SA Kruger to identify telephone number **(831) 582-7847** (hereinafter referred to as the **subject cellular telephone**). SA Kruger requested and obtained telephone subscriber information on the **subject cellular telephone** that indicated the telephone was subscribed to Thomas ANDERSON at the address of 4749 E. Concord Road, St. Louis, Missouri 63128 (ANDERSON'S parent's residence). Subscriber information also indicated the user of the telephone had provided the telephone company with an email address of: THOMASGREGORYJRANDERSON@GMAIL.COM. Also, of interest was the fact the phone was subscribed to on July 16, 2014. This date coincided with the suspension of ANDERSON'S previous telephone number, (314) 779-8314. As a result, your affiant believes this number to be utilized by ANDERSON.

In summary, investigators have identified that ANDERSON has been involved in the distribution of bulk marijuana dating back to at least 2007 and ANDERSON is responsible for the distribution in excess of 2,200 pounds of marijuana. Based on the investigation to date, investigators have not received any recent information that ANDERSON is still in the St. Louis, area and investigators have not received any information regarding where ANDERSON primarily resides. In addition, investigators have received information from multiple confidential sources during this investigation that ANDERSON previously fled the country as a result of the ongoing investigation.

On July 30, 2014, SA Moles is scheduled to testify before the federal Grand Jury relative to the facts and circumstances of the ongoing investigation targeting the Thomas ANDERSON Marijuana Distribution Organization. Your affiant is requesting the authorization of a Precision Location Information Warrant for the **subject cellular telephone** to assist investigators in attempting to locate and arrest ANDERSON acknowledging there is a federal arrest warrant issued in the Eastern District of Missouri, as a result of the Grand Jury testimony. Your affiant believes that based on the information received during this investigation that if ANDERSON learns of the indictment then ANDERSON will flee the country in an attempt to elude investigators

The investigation has indicated that the **subject cellular telephone** is being utilized by a person in connection with the commission of offenses involving ongoing violations of Title 21, United States Code, Sections 841(a)(1) and 846. Your affiant believes that the requested authorization would be a valuable asset in achieving the overall goals of the investigation. The location of the **subject cellular telephone** would provide critical information regarding the drug trafficking conspiracy by permitting the investigative team to monitor the movements of the **subject cellular telephone** (and its owner), thereby assisting in the identification of the

co-conspirators and the discovery and seizure of narcotics.

Disclosure of the existence of the requested Warrant would cause the targets to dispose of the **subject cellular telephone** and seriously jeopardize the investigation. In light of the ongoing nature of the investigation, it is requested that this affidavit, along with the application and Warrant, be sealed.

WHEREFORE, your affiant respectfully requests that the Court issue a Warrant directing AT&T, any telecommunication service providers reflected in Attachment 1, here incorporated by reference, and any other applicable service provider(s), to activate signaling information, including cell site information, precision location information, and factory installed GPS information located in the above-referenced **subject cellular telephone**. Monitoring of the signals are to occur for a period of forty-five (45) days following the issuance of the Court's Warrant, including signals produced from inside private residences and other locations not open to the public or visual surveillance, and signals produced in the event that the **subject cellular telephone** leaves the Eastern District of Missouri but remains within the United States; and to order the application, affidavit and Warrant be sealed.


ERIC KRUGER
Special Agent, DEA

Dated this 28 day of July, 2014.

Sworn to and subscribed before me this 28th day of July, 2014.


NANNETTE A. BAKER
UNITED STATES MAGISTRATE JUDGE

LIST OF TELECOMMUNICATION SERVICE PROVIDERS

AT&T

and

01 Communications	Empire Paging	MCI Worldcom	Smart Beep Paging
Access Line Communication	Ernest Communications	Metro PCS	Smart City Telecom
ACN Communications	Echelon Telecommunications	Metro Teleconnect	Socket Telecom
ACS	EZ Talk Communications	Mid-Atlantic	South Central Bell
Aero Communications, Inc. (IL)	FDN Communications	Midvale Telephone Exchange	Sprint
Afford A Phone	Fibernet Comm	Midwest Wireless	Sprint Spectrum, L.P.
Airvoice Wireless	Florida Cell Service	Millington Telephone	SRT Wireless
Alaska Communications	Florida Digital Network	MLM Telecommunications	Star Telephone Company
Alhambra-Grantfx Telephone	Focal Communications	Mobile Communications	Start Wireless
AmeriTel	Frontier Communications	Mound Bayou Telephone Co.	Sugar Land Telephone
AOL Corp.	Gabriel Comm	Mountain Bell	Sure West Telephone Company
Arch Communication	Galaxy Paging	Mpower Communications	Talk America
AT&T	Global Communications	Navigator	TC-St. Louis
AT&T Mobility	Global Crossing	Telecommunications	Tele Touch Comm
Bell Aliant	Global Eyes Communications	NE Nebraska Telephone	Telecorp Comm
Big River Telephone	Global Naps	Netlink Comm	Telepak
Birch Telecom	Global Rock Network	Network Services	Telistire
Blackberry Corporation	Grafton Telephone Company	Neustar	Telnet Worldwide
Brivia Communications	Grand River	Neutral Tandem	Tex-Link Comm
Broadview Networks	Grande Comm	Nex-Tech/United Wireless	Time Warner Cable
Broadvox Ltd.	Great Plains Telephone	Nexus Communications	T-Mobile
Budget Prepay	Harrington Telephone	NII Comm	Total Call International
Bulls Eye Telecom	Harrisonville Telephone Co.	North Central Telephone	Tracfone Wireless
Cable Vision	Heartland Communications	North State Comm	Trinity International
Call Wave	Hickory Telephone	Northcoast Communications	Triton PCS Company
Cbeyond Inc.	Houston Cellular Telephone	Novacom	U-Mobile
CCPR Services	Huxley Communications	Ntera	Unicel Cellular
Cellco Partnership, d/b/a Verizon Wireless	iBasis	N-Teelus Wireless	United On-Line
Cellular One	IDT Corporation	NTS Communications	United States Cellular Corp.
Cellular South	Illinois Consolidated Communications	Oklahoma City SMSA	United Telephone of MO
Centennial Wireless	Illinois Valley Cellular	ONSTAR	US Cellular
Century Tel	Insight Phone	Optel Texas Telecom	US Communications
Champaign Cellular	Integra	Orion Electronics	US LEC
Charter Communications	Iowa Wireless	PacBell	US Link
Chickasaw Telephone	IQ Telecom	PacWest Telecom	US West Communications
Choctaw Telephone Company	J2 Global Communications	PAETEC Communications	USA Mobility
Choice Net Comm.	Leap Wireless International	Page Plus Communications	VarTec Telecommunications
Cimco Comm	Level 3 Communications	Page Mart, Inc.	Verisign
Cincinnati Bell	Level One	Page Net Paging	Verizon Telephone Company
Cinergy Communications	Local Links Communications	Panhandle Telephone	Verizon Wireless
Citizens Utilities	Locus Communications	Peerless Network	Viaero Wireless
Clear World Communication	Logix Communications	Pineland Telephone	Virgin Mobile
Com-Cast Cable Comm.	Longlines Wireless	PhoneTech	Vonage Holdings
Comm South Companies	Los Angeles Cellular	PhoneTel	Wabash Telephone
Commercial Communications	Madison River	Preferred Telephone	Weblink Wireless
Consolidated Communications	Communications	Priority Communications	Western Wireless
Conversent Communications	Madison/Macoupin Telephone Company	Puretalk	Westlink Communications
Cox Communications	Mankato Citizens Telephone	RenTel	Windstream Communications
Cricket Wireless	Map Mobile Comm	RCN Telecom	WinStar Communications
Custer Telephone Cooperative	Marathon Comm	RNK Telecom	Wirefly
DBS Communications	Mark Twain Rural	QWEST Communications	WISPNET, LLC
Delta Communications	Matrix Telecom, Inc.	Sage Telecom	World Comm
Detroit Cellular	Max-Tel Communications	SE All-Tel Comm	XO Communications
Dobson Cellular	McCleod USA	Seren Innovations	Xspedius
Egyptian Telephone		Sigecom LLC	Yakdin Valley Telephone
Electric Lightwave, Inc.		Sky Tel Paging	YMAX Communications
			Ztel Communications